

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

v.

HENRY KYLE FRESE,

Defendant.

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Case No. 1:19-cr-00304-LMB

DEFENDANT’S UNOPPOSED MOTION TO PERMIT TRAVEL

Defendant HENRY KYLE FRESE, by and through counsel, respectfully asks this Court for permission to travel to Houston, Texas from July 2 through July 14, 2020, so that he can spend some time with his parents before he is designated to serve his 30-month sentence. Mr. Frese also seeks permission to travel from Houston, Texas, to Huntsville, Alabama, from July 14 through July 22, 2020, so that he can visit with his girlfriend, A.E., before serving his sentence. Mr. Frese will return to his home in Philadelphia, Pennsylvania, on July 22, 2020, where he will remain until he reports to the designated BOP facility. Undersigned counsel has consulted with counsel for the United States, who have indicated that the government does not oppose Mr. Frese’s request as long as it has been approved by Pretrial Services. Pretrial Services has been made aware of Mr. Frese’s travel request and has indicated that they will await the Court’s ruling on this Motion.

WHEREFORE, based on the foregoing good cause, Defendant respectfully requests that this Court grant him permission to travel from Philadelphia, PA to Houston, Texas, from July 2 through July 14, 2020, and from Houston, Texas to Huntsville, Alabama, from July 14 through July 22, 2020.

Date: June 26, 2020

Respectfully submitted,

Henry Kyle Frese,
By Counsel,

/s/ Stuart Sears

Stuart Sears

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of June, 2020, I electronically filed a true copy of the foregoing motion with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties.

/s/ Stuart Sears

Stuart Sears

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